

MARYLAND TRANSPORTATION AUTHORITY

William Donald Schafer
Governor

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July 6, 1993 FCC MAIL ROOM

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JUL 16 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, NW - Room 222
Washington, DC 20554

Dear Ms Searcy:

The Maryland Transportation Authority supports the comments filed by the International Bridge, Tunnel and Turnpike Association (IBTTA), representing over 300 toll facilities worldwide, opposing the Notice of Proposed Rulemaking (NPRM), PR Docket 93-61.

This NPRM would change interim regulations governing the use of Industrial, Scientific and Medical (ISM) applications operating in the range of 902-928 MHz. Electronic Toll and Traffic Management (ETTM) and Automatic Vehicle Identification (AVI) systems, examples of Intelligent Vehicle Highway Systems (IVHS), also use this band.

Should this NPRM be granted, there would be inadequate frequencies available to operate effective and accurate electronic toll collection systems as desired by the motoring public nationwide. Adoption of this NPRM would give an exclusive use status to one particular type of an IVHS application, a vehicle location and tracking system when these systems were designed to effectively co-exist in this frequency.

Under this NPRM, highway agencies, toll facilities and ultimately the consumer would have to pay the anticipated costs and endure undue inconvenience when existing ETTM systems would have to be modified to conform to the new operating frequencies within the stated three year migration period.

For toll authorities planning to install and operate ETTM systems in the near future, they would experience implementation delays, greater risks and increased costs with such limited frequency availability.

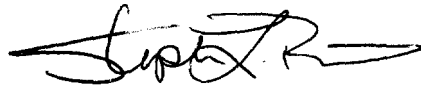
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Enclosed for your convenience, is a copy of IBTTA's Executive Summary highlighting its opposition to the NPRM.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen L. Reich", with a long horizontal flourish extending to the right.

Stephen L. Reich
Acting Executive Secretary

SLR:tlb
Enclosure

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Executive Summary

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Statement of the
International Bridge, Tunnel and Turnpike Association

Amendment of Section 90.239 - Federal Communications
Commission's Rules to Adopt Permanent Regulations for
Automatic Monitoring Systems: RM-8013: PR Docket No. 93-61:

Frequency Allocation Issue; PR Docket 93-61
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ETTM Definition

Recent technological advances allow the toll industry to collect tolls electronically in the accurate, efficient and cost-effective manner desired by the motoring public. Using ETTM systems, motorists can pay tolls in a hands-free, non-stop environment at highway speeds.

ETTM systems allow drivers to pass through toll plazas

Frequency Allocation Issue; PR Docket 93-61
Executive Summary of IBTTA
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In another effort, seven toll authorities in the Northeast are participating in an Interagency Group to select a compatible ETTM system for use by motorists throughout the New York, New Jersey and Pennsylvania region. This region accounts for nearly 40 percent of all toll transactions and

Granting this NPRM would jeopardize toll agencies that currently use ETMM applications successfully throughout the United States. It would also seriously hamper those agencies planning to use ETMM in the future. Highway officials could lose the ability to use proven technology to meet regional transportation needs.

Specifically, this NPRM would provide more spectrum for wide-band uses, specifically 16 MHz in the 904-912 and 918-926 MHz bands. Narrow-band applications, such as ETMM, would only be given 10 MHz in the 902-904, 912-918, and 926-928 MHz bands. Secondly, even though the NPRM would not by definition be granting an exclusive use status for one IVHS application, it would be giving wide-band systems exclusivity in bands already used by ETMM systems.

The Association submitted comments, filed December 7, 1992, opposing the petition for rulemaking by North American Teletrac Location Technologies, Inc. (Teletrac). Teletrac, through its petition, desires to change the existing interim FCC regulations seeking exclusive use of a large part of the 900 MHz band.

IBTTA understands that the Teletrac system, defined as a wide-band use, is a pulse-ranging vehicle location system. Teletrac and similar products will, in the future, benefit the public by tracking commercial truck traffic, locating stolen vehicles and providing emergency road service.

Teletrac is one example of an IVHS technology serving a particular need of a specific group of users or customers. Similarly, ETMM systems are another type of application serving a unique need.

Conclusion

The Association believes that adopting this NPRM would not serve the best interests of national transportation policy in the United States. The Commission, for all practical purposes, would be implementing the desires expressed by Teletrac in its original petition, while contradicting the vision and expectations of ISTEA and the Clean Air Amendments. The FCC would find itself prioritizing one IVHS application over another, though each is designed to meet a separate demand.

Should this NPRM be adopted, it would interfere with future ETMM systems. Such action would discourage interested parties from spending time staff resources and money to research, test and develop ETMM applications that provide AVI services under the FCC Part 90 regulations.